



RE: Third West Weekly Report
Shepherd, Michael to: Joyce Ackerman
Cc: "Craig Barnitz (cbarnitz@utah.gov)"

02/10/2012 08:52 AM

From: "Shepherd, Michael" <Michael.Shepherd@PacifiCorp.com>
To: Joyce Ackerman/R8/USEPA/US@EPA
Cc: "Craig Barnitz (cbarnitz@utah.gov)" <cbarnitz@utah.gov>

Joyce,

In response to the two concerns:

1. Newman - We met with Newman onsite the same day we learned of the man taking scrap metal. We reviewed the discrepancies with their behavior and the Work Plan and made it very clear it is unacceptable. We also have increased site visits from Rocky Mountain Power Environmental team to inspect the performance of Newman and identify any areas of concern. R&R Environmental has been asked to call me the instant a violation occurs so we can address it immediately. If another major violation occurs we will stop work and have another tailboard meeting with Newman, RMP environmental team, and R&R Environmental. I am optimistic we have their attention and we will finish the civil work on this project strongly, without incident. I will, of course, keep you posted.

2. Chrysotile hits - I asked R&R Environmental to give me their assessment of why we have had so many chrysotile hits. This is what they said, "Most likely background (i.e. brake pads, clutches, roofs, etc.)". When I pressed them for more, this is what they said, "Justin and Jon both mentioned that last fall they observed workers on the 'Artistic Printing' roof performing repairs and winterizing swamp coolers. This was associated with one or two Chrysotile 'hits' (meaning, the days the repairs were observed we had Chrysotile appear on the radar). Their roof does contain Chrysotile (I believe we sampled in 2004-05). The roof was in a deteriorated state in 2004-05 and we (EPA, DEQ/DAQ, and R&R) theorized that it was the source. I'd wager that it's the source again (at least for some of the 'hits')". I agree with their comments, we have torn down a few items inside the substation, but we had them inspected for asbestos during the 2004-2005 clean-up and had any identified asbestos removed. We will continue to monitor this situation and do all we can from inside the sub to ensure we limit the amount of dust that may contain asbestos entering the public areas.

Thanks,

Mike Shepherd
Project Manager
Rocky Mountain Power - Major Projects
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-----Original Message-----

From: Joyce Ackerman [mailto:Ackerman.Joyce@epamail.epa.gov]
Sent: Wednesday, February 08, 2012 12:39 PM
To: Shepherd, Michael
Cc: 'Craig Barnitz (cbarnitz@utah.gov)'
Subject: Re: Third West Weekly Report

Dear Mike - I have been behind on reading all the reports, but caught up this morning from the end of December to the present. I was very disappointed to read of several incidents by Newman employees violating required procedures for the exclusion zone. The incident of a Newman employee trying to remove scrap metal from the exclusion zone was particularly egregious. I noticed that even when R&R would warn about visible dust emissions, Newman failed to take action. It appeared from the reports that their performance improved slightly in recent weeks, but I am concerned that it may be temporary.

It appears that Newman is not following the procedures set forth in the Work Plans approved by EPA and Utah DEQ. I recommend immediate corrective action by Rocky Mountain Power to warn the contractor of their failure to follow correct procedures. As stated in the approval letters, EPA and/or Utah DEQ have the authority to require at any time that work be halted on the site. Such a step should not be necessary since you have approved Work Plans - your company just needs to enforce against your contractor Newman.

I am also concerned about the repeated detections of chrysotile in the perimeter monitoring. At first I thought these might be just background concentrations, but since they have been appearing almost every week, I am starting to think they are originating from some kind of site work. The most recent was a detection of 4 fibers resulting in an air concentration of nearly 0.02 structures/cc that could be migrating from the site to public spaces outside the site. Workers have some protection (except when they are removing their respirators inside the exclusion zone to talk), but the public has no such protection. I recommend that you and your contractors consider your activities to determine if there are sources of chrysotile in your construction activities that could be causing these releases, i.e., are materials being crushed or otherwise disturbed that could contain chrysotile?

I would appreciate your reply to these two issues. Please do not hesitate to contact me and Craig Barnitz with any questions/comments/corrections.

Joyce Ackerman, On-Scene Coordinator
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From: "Shepherd, Michael" <Michael.Shepherd@PacifiCorp.com>
To: Joyce Ackerman/R8/USEPA/US@EPA, "'Craig Barnitz
(cbarnitz@utah.gov)'" <cbarnitz@utah.gov>
Date: 02/01/2012 03:32 PM
Subject: Third West Weekly Report

Joyce & Craig,

Attached are the reports for the week of January 23, 2012.

All air monitoring results came back negative, except the positive hits of chrysotile on Thursday and Friday last week.

I should have an incident report to you by the end of the week.

Please let me know if you have any questions.

Thanks,

Mike Shepherd

Project Manager

Rocky Mountain Power - Major Projects

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[attachment "Weekly Report 01-23 to 01-27-12.pdf" deleted by Joyce Ackerman/R8/USEPA/US] [attachment "Third West Weekly Log 2011-04.pdf" deleted by Joyce Ackerman/R8/USEPA/US] [attachment "228373-1.pdf" deleted by Joyce Ackerman/R8/USEPA/US] [attachment "228454-1.pdf" deleted by Joyce Ackerman/R8/USEPA/US] [attachment "228518-1.pdf" deleted by Joyce Ackerman/R8/USEPA/US] [attachment "228612-1.pdf" deleted by Joyce Ackerman/R8/USEPA/US] [attachment "228714-1.pdf" deleted by Joyce Ackerman/R8/USEPA/US]